

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

THOMAS W. MCNAMARA, as the Court-
Appointed Receiver for StratFS, LLC (f/k/a
Strategic Financial Solutions, LLC), et al.,

Case No.
1:25-CV-00275

Plaintiff,

vs.

ICE LEGAL, P.A., a Florida Profit Corporation,
THOMAS ICE, an individual, and ARIANE ICE,
an individual,

Defendants.

**NOTICE OF JOINED RULE 12 MOTIONS:
MOTION FOR MORE DEFINITE STATEMENT; MOTIONS TO DISMISS FOR LACK
OF PERSONAL JURISDICTION AND INSUFFICIENT PROCESS, ON THE GROUNDS
THAT CLAIMS MUST BE ARBITRATED, AND FAILURE TO STATE A CLAIM; AND
MOTION TO STRIKE;**

AND IN THE ALTERNATIVE, MOTION TO STAY THE PROCEEDINGS

**ORAL ARGUMENT REQUESTED
NOTICE OF INTENT TO FILE REPLY**

Moving Parties:	Defendants, Ice Legal, P.A., Thomas Ice and Ariane Ice
Date and Time	To be determined by the Court.
Place:	Robert H. Jackson United States Courthouse 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Memorandum in Support of Joined Rule 12 Motions: Motion for More Definite Statement; Motions to Dismiss for Lack of Personal Jurisdiction and Insufficient Process, on the Grounds that Claims Must Be Arbitrated, and Failure to State a Claim; and Motion to Strike; and in the Alternative,

Motion to Stay the Proceedings; with attached exhibits.

Answering Papers:

To be filed on a schedule determined by the Court. The moving parties intend to file a reply.

Relief Requested:

1. An order requiring the filing of a more definite statement.
2. An order dismissing the case for lack of personal jurisdiction and insufficient process.
3. An order dismissing the case on the grounds that the claims must be arbitrated.
4. An order dismissing all or portions of claims for failure to state a claim.
5. An order striking certain statements from the Complaint.
6. In the alternative, and without waiving jurisdictional objections, an order staying the proceedings.

Grounds For Relief:

1. Rule 12(e) Fed. R. Civ. P.
2. Rules 12(b)(2), 12(b)(4) Fed. R. Civ. P.
3. Rules 12(b)(1), 12(b)(3), 12(b)(6) Fed. R. Civ. P., Federal Arbitration Act
4. Rule 12(b)(6) Fed. R. Civ. P.
5. Rule 12(f) Fed. R. Civ. P.
6. The Court's inherent authority.

Oral Argument:

The Defendants request oral argument.

Dated: May 1, 2025

Lundergan Legal, LLC

/s/ Amanda L. Lundergan

Amanda L. Lundergan, Esq.
Post Office Box 211474
Royal Palm Beach, FL 33421
Direct: (561) 779-4126
Assistant: (561) 629-2643
Email: amanda@lunderganlegal.com

*Attorneys for Defendants,
Ice Legal, P.A., Thomas Ice and
Ariane Ice*